

From: Wilwerding, Joseph  
Sent: Monday, December 03, 2018 05:06 PM  
To: Mia, Marcia  
Subject: RE: Please Review by Dec. 3: Alternative Compliance Draft Paper

Ok, sorry I didn't pick up on this in the other exchange.

Good luck! ;)

Joe Wilwerding

USEPA Region 8, Office of Enforcement, Compliance & Environmental Justice  
1595 Wynkoop Street, Denver, CO 80202-1129  
(303) 312-6729, wilwerding.joseph@epa.gov

From: Mia, Marcia  
Sent: Monday, December 3, 2018 9:50 AM  
To: Wilwerding, Joseph <Wilwerding.Joseph@epa.gov>  
Subject: RE: Please Review by Dec. 3: Alternative Compliance Draft Paper

Normally I would say YES! But this is a bit complicated as it came in through the Unconventional O&G group and you would need to coordinate with your POC - Megan McGarvey. We are trying to be super careful because of the proposal for NSPS 0000a.

Marcia B Mia

Air Branch

Office of Compliance

2227A WJCS

U.S. Environmental Protection Agency

202-564-7042

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From: Wilwerding, Joseph  
Sent: Monday, December 03, 2018 11:29 AM  
To: Mia, Marcia <Mia.Marcia@epa.gov>

Subject: RE: Please Review by Dec. 3: Alternative Compliance Draft Paper

Ok. Is my participation needed? I can sit in if you want. Need a call-in number, however.

Joe Wilwerding

USEPA Region 8, Office of Enforcement, Compliance & Environmental Justice

1595 Wynkoop Street, Denver, CO 80202-1129

(303) 312-6729, wilwerding.joseph@epa.gov

From: Mia, Marcia

Sent: Monday, December 3, 2018 9:24 AM

To: Wilwerding, Joseph <Wilwerding.Joseph@epa.gov>

Subject: RE: Please Review by Dec. 3: Alternative Compliance Draft Paper

Yes, it is at 3 pm EST. We are in listening mode only.

Marcia B Mia

Air Branch

Office of Compliance

2227A WJCS

U.S. Environmental Protection Agency

202-564-7042

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From: Wilwerding, Joseph

Sent: Monday, December 03, 2018 11:17 AM

To: Mia, Marcia <Mia.Marcia@epa.gov>

Subject: RE: Please Review by Dec. 3: Alternative Compliance Draft Paper

Hi Marcia, was there a meeting scheduled on this for today?

I'm holding off on reviewing for now per your below guidance. Thanks,

Joe

Joe Wilwerding

USEPA Region 8, Office of Enforcement, Compliance & Environmental Justice

1595 Wynkoop Street, Denver, CO 80202-1129

(303) 312-6729, wilwerding.joseph@epa.gov

From: Mia, Marcia

Sent: Thursday, November 29, 2018 11:31 AM

To: Wilwerding, Joseph <Wilwerding.Joseph@epa.gov>; Chapman, Apple <Chapman.Apple@epa.gov>; Patefield, Scott <Patefield.Scott@epa.gov>; Loukeris, Constantinos <loukeris.constantinos@epa.gov>; Hoyt, Daniel <Hoyt.Daniel@epa.gov>; Palermo, Mark <palermo.mark@epa.gov>; Sullivan, Tim <Sullivan.Tim@epa.gov>; Ostrand, Laurie <Ostrand.Laurie@epa.gov>; Beeler, Cindy <Beeler.Cindy@epa.gov>; Cronkhite, Leslie <Cronkhite.Leslie@epa.gov>

Subject: RE: Please Review by Dec. 3: Alternative Compliance Draft Paper

Importance: High

Hi folks,

## Ex. 5 Deliberative Process (DP)

## Ex. 5 Deliberative Process (DP)

Thanks for your efforts so far on a short turnaround and sorry for the whiplash.

Marcia B Mia

Air Branch

Office of Compliance

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202-564-7042

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From: Wilwerding, Joseph

Sent: Wednesday, November 28, 2018 12:47 PM

To: Mia, Marcia <Mia.Marcia@epa.gov>

Subject: FW: Please Review by Dec. 3: Alternative Compliance Draft Paper

Hi Marcia, I'd like to attend the call if I can, but am out on work travel from now until next week. Thanks,

Joe

Joe Wilwerding

USEPA Region 8, Office of Enforcement, Compliance & Environmental Justice

1595 Wynkoop Street, Denver, CO 80202-1129

(303) 312-6729, wilwerding.joseph@epa.gov

From: Chapman, Apple

Sent: Wednesday, November 28, 2018 6:14 AM

To: Patefield, Scott <Patefield.Scott@epa.gov>; Wilwerding, Joseph <Wilwerding.Joseph@epa.gov>; Loukeris, Constantinos <loukeris.constantinos@epa.gov>; Hoyt, Daniel <Hoyt.Daniel@epa.gov>; Palermo, Mark <palermo.mark@epa.gov>; Sullivan, Tim <Sullivan.Tim@epa.gov>; Ostrand, Laurie <Ostrand.Laurie@epa.gov>; Beeler, Cindy <Beeler.Cindy@epa.gov>

Cc: Fried, Gregory <Fried.Gregory@epa.gov>

Subject: FW: Please Review by Dec. 3: Alternative Compliance Draft Paper

I think some of you may already be in the loop on this but I am forwarding just in case you have not seen it yet. Please review the attached and check with Marcia to ensure you get an invite to the meeting on 12/3.

Thanks!

Ms. Apple Chapman |Deputy Director, Air Enforcement Division | U.S. Environmental Protection Agency

1200 Pennsylvania Ave. NW, Washington DC, 20004 |202-564-5666 (office)|202-841-6076 (mobile)|

From: Mia, Marcia

Sent: Tuesday, November 27, 2018 3:18 PM

To: Chapman, Apple <Chapman.Apple@epa.gov>

Subject: FW: Please Review by Dec. 3: Alternative Compliance Draft Paper

Hey Apple,

We just got confirmation from OAR that they were okay with EPA commenting on the attached document. Sorry for the short turnaround. There will be two steps:

Meeting on 12/3 to discuss the questions that ECOS raised, in their email below (scroll to bottom and highlighted section);

RLSO of a share point version of the file by 12/5.

OGC will review and Jim will send back out to ECOS.

If you have any immediate thoughts you would like to share, we will have a ORD, OECA, OGC and OAR staff pre-planning call (probably Thursday) - I can relay them. I have provided my initial thoughts to their questions in RED, below, in the highlighted area. I also highlighted some areas in the document to focus your review with a few of my own thoughts.

I suggested that Jim also include some regional folks, and on today's UOG POC call I gave the R5 POC Kosta's name and I gave R8 POC Laurie Ostrand and Cindy Beeler's names.

OGC (Pooja Parikh) also provided the following counsel to avoid FACA issues:

**Ex. 5 Attorney Client (AC)**

**Ex. 5 Attorney Client (AC)**

Marcia B Mia

Air Branch

Office of Compliance

2227A WJCS

U.S. Environmental Protection Agency

202-564-7042

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From: Kenney, James

Sent: Friday, November 09, 2018 9:13 AM

To: Parikh, Pooja <Parikh.Pooja@epa.gov>; Hambrick, Amy <Hambrick.Amy@epa.gov>; Mia, Marcia <Mia.Marcia@epa.gov>; Davis, Alison <Davis.Alison@epa.gov>; Teichman, Kevin <Teichman.Kevin@epa.gov>

Cc: Thoma, Eben <Thoma.Eben@epa.gov>; Dewees, Jason <Dewees.Jason@epa.gov>

Subject: FW: Please Review by Dec. 3: Alternative Compliance Draft Paper

Importance: High

OAR, OECA, OGC and ORD Oil and Gas Contacts -

Please see the message below and the attached draft report: Pathways for alternative compliance methodologies - A framework to advance innovation, environmental protection and prosperity. The draft report is a work product of ECOS, member states and the EDF. It deals with LDAR, equivalency, monitoring and reporting, etc.

Ex. 5 Deliberative Process (DP)

## Ex. 5 Deliberative Process (DP)

Some of you may remember that we were asked to participate in a call on this effort in spring of this year. We agreed to listen in and learn about the effort to better inform our decision making about more robust participation. Eben Thoma/ORD, Jason Dewees/OAR, and I were invited to participate. Subsequent to that meeting, the ECOS effort paused while the EPA regulatory landscape was changing at the national level.

As a next step, I'd like for us to make sure we check the following boxes before we participate or provide feedback -

Pooja/OGC -

Ex. 5 Attorney Client (AC)

## Ex. 5 Attorney Client (AC)

Ex. 5 Deliberative Process (DP)

## Ex. 5 Attorney Client (AC)

Amy/Alison -

Ex. 5 Deliberative Process (DP)

## Ex. 5 Deliberative Process (DP)

Marcia -

Ex. 5 Deliberative Process (DP)

## Ex. 5 Deliberative Process (DP)

Kevin -

Ex. 5 Deliberative Process (DP)

I am cc'ing Eben and Jason so they are in the loop.

Thanks,

Jim

--

James C. Kenney | Senior Policy Advisor for Oil and Gas

Office of Congressional and Intergovernmental Relations | Office of the Administrator |  
U.S. EPA

Desk/Mobile: (202) 768-2618 | Email: kenney.james@epa.gov

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Please note: I am geographically located in Albuquerque, New Mexico (Mountain Time Zone).

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From: Lia Parisien <lparisien@ecos.org>

Sent: Wednesday, November 7, 2018 3:32 PM

To: Lia Parisien <lparisien@ecos.org>

Subject: Please Review by Dec. 3: Alternative Compliance Draft Paper

Advisory Group Members:

A few months ago we held a kickoff call to discuss plans for an Environmental Defense Fund/ECOS Shale Gas Caucus white paper on pathways for alternative compliance. The paper aims to assist state regulators in implementing oil and gas air rules that encourage innovation, and to help them act on applications for new methane reduction methodologies.

We've incorporated your suggestions and developed a draft paper for your review. Ahead of our next call on December 3 at 3-4 p.m. Eastern, please review the attached draft and be prepared to address the following questions::

- Are the lessons learned clear? Does the paper capture your understanding of the challenges of alternative compliance, or is there anything else to add? I am only familiar with the EPA method for AMELs and the CO AIMM procedure.

Ex. 5 Deliberative Process (DP)

## Ex. 5 Deliberative Process (DP)

- Are the recommendations compelling and comprehensive? Anything else to add?[]

Ex. 5 Deliberative Process (DP)

- What roles would others need to play to carry out the recommendations? What new roles would be required of your agency?[] Ex. 5 Deliberative Process (DP)

- Are you familiar with any additional shared models that could inform the recommendation?[] Ex. 5 Deliberative Process (DP)

If you have questions or would like to share suggestions before the call, please email Aileen Nowlan of EDF at [anowlan@edf.org](mailto:anowlan@edf.org) and Lia Parisien of ECOS at [lparisien@ecos.org](mailto:lparisien@ecos.org).

Many thanks,

--

Lia Parisien

Executive Project Manager

Environmental Council of the States (ECOS)

(202) 266-4931

[www.ecos.org](http://www.ecos.org)

Mark your calendar for the April 8-10, 2019 ECOS Spring Meeting in Crystal City, VA!

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Lia Parisien

Executive Project Manager

Environmental Council of the States (ECOS)

(202) 266-4931

[www.ecos.org](http://www.ecos.org)

Mark your calendar for the April 8-10, 2019 ECOS Spring Meeting in Crystal City, VA!